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August 15, 2025

VIA ECF

Honorable Arun Subramanian, USDJ
United States District Court
Southern District of New York
500 Pearl Street, Room 15A
New York, New York 10007

Re: *Gallardo v. 530 Food Corp., et al.*
Case No. 1:25-cv-00201

Dear Judge Subramanian,

We submit this letter in response to plaintiff, Isidro Gallardo ("Plaintiff"), letter motion seeking to compel the deposition of named party, Ted Park and 530 Food Corp. and 2401 Food Corp.'s designated corporate representative, David Kang [Doc. No. 26]. It is unclear why Plaintiff's counsel would file this request because at 5:24 p.m., thirty-minutes prior to filing his motion with the Court, our office emailed Mr. Lee and advised that Mr. Kang was available for his deposition on Tuesday, August 19, 2025, which was one of the dates proposed by Plaintiff's counsel. Our office further advised that Mr. Park's wife is currently in the hospital and, as a result, Mr. Park would be unavailable until after Labor Day. A copy of this email exchange is annexed hereto as Exhibit A.

Additionally, with respect to the deadline for the completion of depositions, it is respectfully requested that the deadline to complete depositions be extended until September 30, 2025, to accommodate Mr. Park's caregiving obligations to his wife.

We thank this Court for its assistance with this matter.

The defendants' request for an extension is GRANTED. They should provide plaintiffs with dates for any outstanding depositions by Monday, August 25, 2025. The motion to compel is denied.

The Clerk of Court is respectfully directed to terminate the motion at ECF No. 26.

SO ORDERED.

A handwritten signature in black ink, appearing to be "Arun Subramanian".

Arun Subramanian, U.S.D.J.
Date: August 20, 2025

— Respectfully submitted,

Forchelli Deegan Terrana LLP

By: /s/Lisa M. Casa

cc: CK Lee, Esq. (via ECF)